UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,	
Plaintiff,	
vs.	
OMNI WYNNE,	
Defendant.	<u>INDICTMENT</u> _/
The Grand Jury charges:	
COUNT 1 (Attempted Possession with Intent to Distribute Cocaine)	

On or about June 9, 2023, in Ingham County, in the Southern Division of the

Western District of Michigan, the defendant,

OMNI WYNNE,

knowingly and intentionally attempted to possess with intent to distribute cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) 21 U.S.C. § 841(b)(1)(C) 21 U.S.C. § 846

COUNT 2

(Possession with Intent to Distribute Cocaine)

On or about June 9, 2023, in Ingham County, in the Southern Division of the Western District of Michigan, the defendant,

OMNI WYNNE,

knowingly and intentionally possessed with intent to distribute cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) 21 U.S.C. § 841(b)(1)(C) FORFEITURE ALLEGATION

(Attempted Possession with Intent to Distribute Cocaine;

Possession with Intent to Distribute Cocaine)

The allegations contained in Counts 1 and 2 of this Indictment are hereby re-

alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to

21 U.S.C. § 853.

Pursuant to 21 U.S.C. § 853, upon conviction of the offense in violation of 21 U.S.C.

§ 841(a)(1) set forth in Count 1 and Count 2 of this Indictment, the defendant,

OMNI WYNNE,

shall forfeit to the United States of America any property constituting, or derived from,

any proceeds obtained, directly or indirectly, as the result of such offense and any

property used, or intended to be used, in any manner or part, to commit, or to facilitate

the commission of, the offense. The property to be forfeited includes, but is not limited

to, the following: approximately \$19,940 in United States Currency seized on or about

June 9, 2023, in Ingham County, Michigan; a 20-gauge Mossberg Shotgun; a .45 caliber

AMT Hardballer handgun; and associated ammunition.

21 U.S.C. § 853

21 U.S.C. § 841(a)(1)

A TRUE BILL

GRAND JURY FOREPERSON

MARK A. TOTTEN

United States Attorney

AUSTIN J. HAKES

Assistant United States Attorney

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